

DONALD R. VAN DER VAART

MICHAEL SCOTT

Acting Director

August 2, 2016

Mr. Mathew F. Colone P.G. CDM-Smith 5400 Glenwood Avenue, Suite 300 Raleigh, NC 27612

Re: Work Plan and Cost Proposal Request

Task Orders: 2666RA-5, 5A, 5B, 5C, 5D, 5E & 5F

Cannon Mills Landfill Kannapolis, Rowan County ID # NCD003162666

Dear Mr. Colone,

Submit a task work plan and cost estimate for remedial activities that will mitigate risks identified at the above referenced site. Conduct these activities in accordance with State Contract No. N13004S.

Task Order 2666RA-5 Planning and Preparation Work Plan

Hold a meeting with the Division of Waste Management, Pre-Regulatory Unit (Unit) project manager to discuss the results of CDM-Smith's evaluation of the Draft Remedial Action Plan (RAP) previously prepared for the site by ESP Associates, P.A. The purpose of this meeting will be used to discuss CDM-Smith's suggested revisions and evaluations to enhance or clarify the design and specifications of the RAP.

Following the meeting, submit a work plan divided into sections for activities to be included in the revised RAP. For each section, identify the activity with itemized cost estimates that includes personnel and materials involved. Each subsection activity will be authorized, completed, and invoiced as a separate task order.

Task Order 2666RA-5A Channel Geomorphic Stability Assessment

Perform a channel geomorphic stability assessment study of the creeks associated with the site. Include a meeting with the City of Kannapolis Public Works Department to discuss stormwater maintenance issues and requirements.

Task Order 2666RA-5B Revised Draft Remedial Action Plan (RAP)

The revised Draft RAP will include:

- 1. The RI-Summary Report incorporated as the executive summary for the revised draft RAP.
- 2. A brief generalized summary of the intended remedial action in non-technical language to the extent practical.
- 3. A summary of the revised draft RAP that outlines how cleanup activities will be accomplished. The summary will individual tasks that may include, but is not limited to:
 - installation of erosion and sediment control measures
 - permits
 - clearing and grubbing the waste disposal area
 - removal or relocation of surface waste
 - excavations for the removal and/or relocation of buried waste (hotspots)
 - asbestos management
 - site security
 - slope stabilization and erosion control
 - grading the waste disposal area for positive stormwater runoff
 - installation of a passive vent system
 - installation of demarcation liner and/or soil stability measures
 - installation of structural fill, topsoil, and/or amended soil
 - establishment of vegetative cover
 - site inspections
 - removal of erosion and sediment control measures
 - monitoring
 - land use restrictions and plat notice

Task Order 2666RA-5C Borrow Materials

Identify the most economical source of cover soil for the Site. If needed, a cost analysis may determine that soil amendment is an option for a borrow source location.

- Soil sampling frequency will be determined by the location of the source area. A quarry is generally considered to be pristine while structural fill from urban development is not.
- Collect GPS coordinates at sampling points for reference. Report coordinates in decimal degrees to the seventh order using the North American Datum of 1983 (NAD83) format. These coordinates will be tabulated and included as an appendix.
- Submit samples to a North Carolina-certified laboratory and analyze for the following parameters by the most current U.S. EPA Contract Laboratory Program Target Compound List:

volatile organic compounds by SW-846 method 8260, 1,4-dioxane by Method 8260SIM, semi-volatile organic compounds by SW-846 method 8270, 14 metals by SW-846 method 6020, and mercury by method 7471. Please note that any alternate method should be the U.S. EPA Method having the lowest detection limit and meets the Site's soil remediation goals.

• Submit a letter report that summarizes this activity with text, tables, and figures, as needed.

Task Order 2666RA-5D Permits

Obtain all permits identified in the revised draft RAP needed to implement activities. Permits may include a temporary driveway permit erosion and sediment control permit, wetland permit, etcetera. Previously a USACE Nationwide Permit (NWP) 13 and corresponding Water Quality Certification was obtained for the site. The NWP-13 is set to expire in March 2017. As part of the revised draft RAP, in lieu of the NWP-13, obtain a NWP-38A and corresponding Water Quality Certification as this is the appropriate permit for remediation efforts.

Task Order 2666RA-5E

Bid Specs, Subcontractor Selection

Solicit four potential North Carolina subcontractors to implement the RAP. Submit bid specifications and engineer design to each subcontractor, and hold a pre-bid on-site meeting. Develop a matrix of received bids for comparison and meet with to the Unit project manager for review and selection.

Task Order 2666RA-5F

Final RAP

Upon review by Unit personnel, substantive responses and any remaining edits will be incorporated into the final RAP document. Implementation of remedial activities included in the RAP will begin after the final RAP document is approved by the Unit.

Provide the work plan and cost estimate by August 12, 2016. A task authorization to begin work will be issued based on the approved proposal. Do not proceed with tasks prior to receiving each authorization

If you have any questions or concerns, I may be reached at (919)707-8230.

Sincerely,

David P. Kwiatkowski, Hydrogeologist Division of Waste Management – NCDEQ